

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE LOOP INDUSTRIES, INC.
SECURITIES LITIGATION

Case No. 7:20-cv-08538-NSR

Consolidated with:
Case No. 7:20-cv-09031-NSR

**LEAD PLAINTIFFS' NOTICE OF UNOPPOSED MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION SETTLEMENT**

Pursuant to Fed. R. Civ. P. 23, Court-appointed lead plaintiffs Sakari Johansson and John Jay Cappa (collectively, "Lead Plaintiffs"), on behalf of themselves and all others similarly situated hereby move this Court for an order granting their unopposed motion seeking: (i) preliminary approval of the proposed Settlement set forth in the Stipulation and Agreement of Settlement dated May 17, 2022 (the "Stipulation"); (ii) certification of the proposed Settlement Class for settlement purposes; (iii) approval of the form and manner of giving notice of the proposed Settlement to Settlement Class Members; (iv) setting deadlines for (a) the mailing of the Postcard Notice, (b) the publication of the Summary Notice, (c) the filing of papers in support of final approval of the filing of papers in support of final approval of the Settlement, Plan of Allocation, and Lead Counsel's application for attorneys' fees and expenses, (d) the receipt of exclusion requests and objections, (e) the filing of reply papers in support of final approval of the Settlement, Plan of Allocation, and Lead Counsel's application for attorneys' fees and expenses, and (f) the submission of Claim Forms; and (v) the scheduling of a hearing date ("Settlement Hearing") at which the Court will consider (a) final approval of the proposed Settlement and entry of the proposed Final Judgment Approving Class Action Settlement, (b) the Plan of Allocation of settlement proceeds, and (c) Lead Counsel's application for an award of attorneys' fees and Litigation Expenses.

This motion is based upon the accompanying Memorandum of Law and Stipulation, with its Exhibits, which are filed contemporaneously herewith, and other such matters and argument as the Court may consider at the hearing on this motion.

Defendants do not oppose the relief sought by this motion.

Dated: May 24, 2022

Respectfully submitted,

POMERANTZ LLP

/s/ Murielle J. Steven Walsh

Jeremy A. Lieberman
Murielle J. Steven Walsh
600 Third Avenue, 20th Floor
New York, NY 10016
Telephone: (212) 661-1100
Facsimile: (212) 661-8665
Email: jalieberman@pomlaw.com
mjsteven@pomlaw.com

GLANCY PRONGAY & MURRAY LLP

/s/ Leanne H. Solish

Gregory B. Linkh (GL-0477)
230 Park Ave., Suite 530
New York, NY 10169
Telephone: (212) 682-5340
Facsimile: (212) 884-0988
glinkh@glancylaw.com
and
Leanne H. Solish (admitted pro hac vice)
1925 Century Park East, Suite 2100
Los Angeles, CA 90067
Telephone: (310) 201-9150
Facsimile: (310) 201-9160
lsolish@glancylaw.com
Lead Counsel for Lead Plaintiffs and the
Settlement Class

LAW OFFICES OF HOWARD G. SMITH
Howard G. Smith
3070 Bristol Pike, Suite 112
Bensalem, PA 19020

Telephone: (215) 638-4847
Facsimile: (215) 638-4867

BRONSTEIN, GEWIRTZ & GROSSMAN,
LLC

Peretz Bronstein
60 East 42nd Street, Suite 4600
New York, New York 10165
Telephone: (212) 697-6484
Facsimile: (212) 697-7296
peretz@bgandg.com

Additional Counsel

CERTIFICATE OF SERVICE

I hereby certify that on this, the 24th day of May, 2022, a true and correct copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Murielle J. Steven Walsh
Murielle J. Steven Walsh